

1 **WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP**
DON SPRINGMEYER, ESQ.
2 Nevada Bar No. 1021
JORDAN BUTLER, ESQ.
3 Nevada Bar No. 010531
3556 E. Russell Road, Second Floor
4 Las Vegas, Nevada 89120
(702) 341-5200/Fax: (702) 341-5300
5 dspringmeyer@wrslawyers.com
JButler@wrslawyers.com

6 *Attorneys for Plaintiff*

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 PERFORMANCE RHINO LLC, a Nevada
limited liability company d/b/a/ GUN
GARAGE,

11 Plaintiff,

12 vs.

13 GUN GARAGE & SHOOTING RANGE
14 LLC, a Kansas limited liability company, and
SUNFLOWER DEVELOPMENT
15 SOLUTIONS LLC, a Texas limited liability
company,

16 Defendants.
17

Case No. 2:19-cv-0450-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT**

(FIRST REQUEST)

18 Pursuant to LR IA 6-1, LR IA 6-2, and LR II 7-1, Defendants GUN GARAGE &
19 SHOOTING RANGE LLC (“GGSR”), and SUNFLOWER DEVELOPMENT SOLUTIONS LLC
20 (“Sunflower”) (collectively, “Defendants”) and Plaintiff PERFORMANCE RHINO LLC
21 (“Plaintiff”), by and through their undersigned counsel, submit this Stipulation to extend the time
22 in which Defendants have to file an Answer or otherwise respond to the Complaint.

23 Defendant GGSR’s deadline to answer or otherwise respond to the Complaint was April 9,
24 2019; Defendant Sunflower’s deadline is April 15, 2019. Counsel for Defendants was formally
25 retained on April 10, 2019. Pursuant to this Stipulation, Defendants shall have up to and including
26 Monday, April 29, 2019, to answer or otherwise respond to the Complaint. This additional time is
27 required to provide counsel for Defendants adequate time to acclimate to the claims and
28 allegations in this action, and effectively represent Defendants’ interests on the heels of being

1 retained. The failure of Defendant GGSR to meet its deadline constitutes excusable neglect in that
2 Defendants are related in this action and sought joint representation. Counsel for Defendants
3 moved swiftly to request a stipulated extension from opposing counsel immediately upon being
4 retained. Further, this Stipulation is made in good faith and not for the purpose of delay.

5 **IT IS SO ORDERED:**

6 
7 _____
UNITED STATES MAGISTRATE JUDGE

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9 DATED: April 11, 2019
10 _____

11 Respectfully submitted,

12
13 DATED this 11th day of April, 2019.

DATED this 11th day of April, 2019.

14 /s/ Jordan J. Butler
DON SPRINGMEYER, ESQ.
15 Nevada Bar No. 1021
JORDAN BUTLER, ESQ.
16 Nevada Bar No. 010531
Wolf Rifkin Shapiro Schulman & Rabkin, LLP
17 3556 East Russell Road, Second Floor
Las Vegas, NV 89120
18 Telephone: (702) 341-5200
19 Fax: (702) 341-5300
dspringmeyer@wrslawyers.com
20 JButler@wrslawyers.com

/s/Jonathan W. Fountain
Jonathan W. Fountain, Esq.
Nevada Bar No. 10351
Stephanie S. Buntin, Esq.
Nevada Bar No. 12339
HOWARD & HOWARD ATTORNEYS
PLLC
3800 Howard Hughes Parkway, Suite 1000
Las Vegas, NV 89169
Tel. (702) 667-4823
Email: iwfh2law.com
Email: sslg4h2law.com

Attorneys for Plaintiff

21 KELLY J. TRUSSELL
(Pro Hac Vice to be Submitted)
22 Of Counsel
Sloan, Eisenbarth, Glassman, McEntire & Jarboe
23 L.L.C.
24 534 S. Kansas Avenue, Suite 1000
Topeka, KS 66603
25 Phone: 785-357-6311 Ext. 236
Fax: 785-357-0152
26 E-mail: ktrussell@sloanlawfirm.com

27 *Attorneys for Defendants*
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 11th day of April, 2019, a true and correct copy
3 of **STIPULATION AND ORDER TO EXTEND TIME FOR GUN GARAGE & SHOOTING**
4 **RANGE LLC AND SUNFLOWER DEVELOPMENT SOLUTIONS LLC TO ANSWER OR**
5 **OTHERWISE RESPOND TO THE PLAINTIFF'S COMPLAINT** was served via the United
6 States District Court CM/ECF system on all parties or persons requiring notice.

7 By /s/ Christie Rehfeld
8 Christie Rehfeld, an Employee of
9 WOLF, RIFKIN, SHAPIRO, SCHULMAN &
10 RABKIN, LLP
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